

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
)	
SIO2 MEDICAL PRODUCTS, INC. et al, ¹)	Case No. 23-10366 (JTD)
)	
)	(Jointly Administered)
)	
Debtors.)	
)	

NOTICE OF SUBSTITUTION OF COUNSEL AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rule 9010-2(a) & (b) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), James P. Menton, Esquire and Robins Kaplan LLP hereby withdraw their appearance as counsel for A. Enterprises, LLC and Robert S. Abrams (together, “Abrams”), in the above-captioned cases (the “Cases”), and request that they be removed from any applicable service lists in the Cases on behalf of Abrams.

PLEASE TAKE FURTHER NOTICE that Richard J. Cooper, David H. Botter, Luke A. Barefoot, and Thomas S. Kessler of Cleary Gottlieb Steen & Hamilton LLP hereby substitute their appearance as counsel for Abrams in this Case.

PLEASE TAKE FURTHER NOTICE that Matthew G. Summers and Laurel D. Roglen of Ballard Spahr LLP remain counsel to Abrams in this Case and their representation is unaffected

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: SiO2 Medical Products, Inc. (8467); Advanced Bioscience Labware, Inc. (1229); and Advanced Bioscience Consumables, Inc. (2510). The location of the Debtors’ principal place of business and service address in these chapter 11 cases is 2250 Riley Street, Auburn, Alabama 36832.

by this notice, and Margaret A. Vesper of Ballard Spahr LLP hereby enters her appearance as counsel for Abrams in this Case.

PLEASE TAKE FURTHER NOTICE that Abrams pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and Local Rule 2002-1(d), and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon Abrams through the undersigned attorneys as follows:

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PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Substitution of Counsel and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of

Abrams including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Abrams are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: May 22, 2023

Respectfully submitted,

/s/ James P. Menton

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*Withdrawing Counsel to A. Enterprises, LLC
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/s/ Matthew G. Summers

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